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CLERK OF DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

October 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

TYLER STEWART,
aka "@TRAGIC,"

Defendant.

CR No. 19-

19CR00014-MWF

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy;
18 U.S.C. § 844(e): Conveying
False Information Concerning the
Use of An Explosive Device;
18 U.S.C. § 2(a): Aiding and
Abetting]

The Grand Jury charges:

INTRODUCTION

At all times relevant to this Indictment:

1. Twitter was an online social networking service on which users posted and interacted with messages known as tweets. Twitter users could also send Direct Messages to one another.

2. A Twitter "handle" was the name a user selected to use on Twitter.

3. Defendant TYLER STEWART resided in, and was located in, Gulf Breeze, Florida. Defendant STEWART used the Twitter handle @TRAGIC.

1 4. Unindicted Co-Conspirator No. 1, Tyler Rai Barriss
2 ("Barriss"), also known as ("aka") "@SWAUTISTIC," aka
3 "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex
4 Mendez," aka "Alex," aka "Matthew," aka "Aaron," resided in, and was,
5 at all times relevant to this Indictment, located in, Los Angeles
6 County within the Central District of California. Barriss used the
7 Twitter handles @SWAUTISTIC and @GOREDTUDOR36.

8 5. "Swatting" was the action or practice of harassing a victim
9 by deceiving an emergency service into sending police and emergency
10 service response teams, including special weapons and tactics
11 ("SWAT") teams, to the victim's address often by making a false
12 report of a serious law enforcement emergency - such as a murder or
13 hostage situation - at the victim's address to trigger the deployment
14 of the response team.

15 6. The above allegations are incorporated by reference into
16 all counts of this Indictment as if fully set forth therein.
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COUNT ONE

[18 U.S.C. § 371]

A. THE OBJECT OF THE CONSPIRACY

1. Beginning on a date unknown to the Grand Jury, but no later than December 4, 2017, and continuing through on or about December 6, 2017, in Los Angeles, within the Central District of California, and elsewhere, defendant TYLER STEWART ("STEWART"), also known as ("aka") "@TRAGIC," together with others known and unknown to the Grand Jury, knowingly conspired and agreed to willfully make a threat and maliciously convey false information knowing the information to be false, by a telephone and instrument of interstate and foreign commerce, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, in violation of Title 18, United States Code, Section 844(e).

B. THE MANNER AND MEANS OF THE CONSPIRACY

2. The object of the conspiracy was to be carried out, and was carried out, in substance as follows:

a. Defendant STEWART would identify a school building that he wanted to evacuate while school was in session.

b. Defendant STEWART would share information concerning that school, to include its address, with Unindicted Co-Conspirator No. 1, Tyler Rai Barriss ("Barriss"), aka "@SWAUTISTIC," aka "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron."

c. Barriss would call the school and willfully and maliciously convey the false information that he had planted bombs at the school, knowing that information to be false.

1 d. Barriss would call law enforcement and willfully and
2 maliciously convey that he had planted bombs at the school, knowing
3 that information to be false.

4 C. OVERT ACTS

5 3. On or about the following dates, in furtherance of the
6 conspiracy and to accomplish its object, defendant STEWART, together
7 other co-conspirators known and unknown to the Grand Jury, committed
8 and caused others to commit various overt acts within the Central
9 District of California and elsewhere, including the following:

10 Overt Act No. 1: On or about December 4, 2017, defendant
11 STEWART, in Twitter Direct Messages, asked Barriss to cause the
12 evacuation of a high school in Gurnee, Illinois (the "Gurnee High
13 School"), and Barriss agreed.

14 Overt Act No. 2: On or about December 5, 2017, Barriss and
15 defendant STEWART investigated the address and telephone number of
16 the Gurnee High School, including by looking up that information
17 online.

18 Overt Act No. 3: On or about December 5, 2017, Barriss and
19 defendant STEWART investigated the address and telephone number for
20 the Gurnee Police Department, including by looking up that
21 information online.

22 Overt Act No. 4: On or about December 5, 2017, Barriss called
23 the Gurnee High School and told a secretary there, in substance and
24 effect, that a person had left a backpack containing dynamite in the
25 Gurnee High School and that it was set to explode.

26 Overt Act No. 5: On or about December 5, 2017, Barriss called
27 the Gurnee Police Department and told a communications-center
28

1 operator that a person had planted a bomb at the Gurnee High School
2 and that the bomb was set to explode.

3 Overt Act No. 6: On or about December 5, 2017, Barriss, in
4 Twitter Direct Messages, told defendant STEWART that he had taken
5 steps to cause an evacuation of the Gurnee High School.

6 Overt Act No. 7: On or about December 6, 2017, in Twitter
7 Direct Messages, defendant STEWART and Barriss agreed to try again to
8 cause an evacuation of the Gurnee High School.

9 Overt Act No. 8: On or about December 6, 2017, Barriss called
10 the Gurnee High School and left a voicemail on a school line in which
11 he said that a person had planted a bomb at the school.

12 Overt Act No. 9: On or about December 6, 2017, Barriss called
13 the Gurnee Police Department and told a communications-center
14 operator that a person left a backpack containing explosives in a
15 classroom at the Gurnee High School, that the explosives were set to
16 explode, that he was high on crystal methamphetamine, that he was
17 carrying a pistol, and that he was considering opening fire on
18 students and teachers.

COUNT TWO

[18 U.S.C. §§ 844(e), 2(a)]

On or about December 5, 2017, in Los Angeles County, within the Central District of California, defendant TYLER STEWART ("STEWART"), also known as ("aka") "@TRAGIC," and Unindicted Co-Conspirator No. 1, Tyler Rai Barriss, aka "@SWAUTISTIC," aka "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," each aiding and abetting the other, by a telephone and other instrument of interstate and foreign commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to a high school in Gurnee, Illinois (the "Gurnee High School"), concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely, and in substance and effect, that a person had planted a bomb at the Gurnee High School and that the bomb was set to explode.

COUNT THREE

[18 U.S.C. §§ 844(e), 2(a)]

On or about December 6, 2017, in Los Angeles County, within the Central District of California, defendant TYLER STEWART ("STEWART"), also known as ("aka") "@TRAGIC," and Unindicted Co-Conspirator No. 1, Tyler Rai Barriss, aka "@SWAUTISTIC," aka "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," each aiding and abetting the other, by a telephone and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to a high school in Gurnee, Illinois (the "Gurnee High School"), concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely, and in substance and effect, that a person had planted a bomb at the Gurnee High School.

COUNT FOUR

[18 U.S.C. §§ 844(e), 2(a)]

On or about December 6, 2017, in Los Angeles County, within the Central District of California, defendant TYLER STEWART ("STEWART"), also known as ("aka") "@TRAGIC," and Unindicted Co-Conspirator No. 1, Tyler Rai Barriss, aka "@SWAUTISTIC," aka "@GOREDTUTOR36," aka "Robert Hayward," aka "Robert," aka "Alex Mendez," aka "Alex," aka "Matthew," aka "Aaron," each aiding and abetting other, by a telephone and other instrument of commerce, willfully made a threat, and maliciously conveyed false information knowing the information to be false, to a police department in Gurnee, Illinois, concerning an alleged attempt being made, or to be made, to kill, injure, and intimidate an individual and to damage and destroy property by means of fire and an explosive, namely, and in substance and effect, that a person left a backpack containing explosives in a classroom at a high

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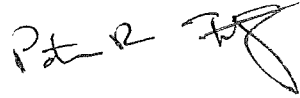
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1 school in Gurnee, that the explosives were set to explode, that he
2 was high on crystal methamphetamine, that he was carrying a pistol,
3 and that he was considering opening fire on students and teachers.

4
5 A TRUE BILL

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7 15/
8 Foreperson

9 NICOLA T. HANNA
10 United States Attorney

11 

12 PATRICK R. FITZGERALD
13 Assistant United States Attorney
Chief, National Security Division

14 CHRITOPHER D. GRIGG
15 Assistant United States Attorney
Chief, Terrorism and Export Crimes
16 Section

17 GEORGE E. PENCE
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Terrorism and Export Crimes
18 Section